

September 30, 2010

Via electronic filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554



5670 Wilshire Blvd. #1300
Los Angeles, CA 90036

**RE: Auction of VHF Commercial Television Station Construction Permits
Scheduled for February 15, 2011, AU Docket No. 10-147, DA 1351**

Dear Ms. Dortch:

On September 8th the Commission sought comment on the competitive bidding procedures for auction 90 in which the Commission will auction off construction permits for VHF television stations in Atlantic City, New Jersey and Seaford, Delaware.

As stated in the Public Notice, the Commission is conducting this auction in order to provide the states of Delaware and New Jersey with commercial VHF television service as required by Section 331 of the Communications Act.

We believe the Commission can fulfill its mandate under Section 331 without restricting the auction winner to Seaford or Atlantic City. The requirements set-out by Section 331 can be satisfied by allowing the auction winner to license the television station to any community in Delaware or New Jersey.

We believe that it would be in the public interest for the Commission to amend the Post-Transition Table of DTV Allotments as set-out in Section 73.622(i) in order to allow the eventual winner of auction 90 to license the VHF television station to any community in Delaware or New Jersey provided that such an allotment would not cause harmful interference to other VHF services.

We note that several commercial television stations are already licensed to Seaford and Atlantic City. By allowing the auction winner to license the VHF television stations to any community in Delaware or New Jersey the Commission increases the likelihood that a commercial television station will be licensed to a community that does not have any commercial television stations at present. We believe that it is clearly in the public interest for television service to be brought to new and underserved communities.

Respectfully Submitted,

Larry Rogow
Chairman, Venture Technologies Group LLC